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*Attorney for Plaintiff,
Executive Lens LLC*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

EXECUTIVE LENS LLC,

Plaintiff,

vs.

LEE RAPKIN and JOHN DOE dba “The
Exposer”
www.youtube.com/@1aAuditsExposé,

Defendants.

Case No. 25-cv-06048-NC

**PLAINTIFF’S NOTICE OF INTENT
TO FILE FIRST AMENDED
COMPLAINT**

1 Undersigned counsel for Plaintiff Executive Lens LLC (“Plaintiff”), hereby notifies
2 the Court that Plaintiff intends to file a First Amended Complaint on or before December
3 30, 2025.

4 On December 9, 2025, Defendant Lee Rapkin (“Defendant”), filed a motion to
5 dismiss pursuant to Federal Rule of Civil Procedure 12(b)(6). (ECF No. 11). Plaintiff’s
6 deadline to oppose the motion is December 23, 2025, but as noted above, Plaintiff is instead
7 electing to file a First Amended Complaint, as a matter of right, pursuant to Federal Rule
8 of Civil Procedure 15(a)(1)(B).

9 Under Rule 15(a)(1)(B), the deadline to amend is December 30, 2025. Plaintiff
10 submits this notice to avoid any confusion regarding the timeliness of its response to
11 Defendant’s Motion to Dismiss (ECF No. 11), as Plaintiff does not intend to file an
12 opposition to the pending motion because it will be rendered moot by the filing of the First
13 Amended Complaint.

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15 Dated: December 18, 2025

16 /s/ Randall S. Newman
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